



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/DCP/LHE/PTH
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 25, 2019

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. All of the enclosed materials qualify as "Discovery Materials" under the January 23, 2017 Stipulation and Order entered in the above-captioned case, ECF Docket No. 76, and their use and dissemination are restricted as provided in that Stipulation and Order. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017, December 26, 2017, March 6, 2018 April 2, 2018, May 10, 2018, June 28, 2018, October 5, 2018, October 26, 2018, January 4, 2019, January 25, 2019, February 4, 2019, February 15, 2019, and April 4, 2019. The government again requests reciprocal discovery from the defendants.

Defense Counsel

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The discovery production made available to you on April 25, 2019 contains the following materials received by the government from third parties:

- Emails and other documents received by the government and produced by SS&C:
 - SSC-00000305 - SSC-00000340
 - SS&C_EDNY_0000001 - SS&C_EDNY_0025917
- Business records and other documents obtained by the government since the government's last discovery production: EDNY-PP-BR-000372943 - EDNY-PP-BR-000376917. A description of those documents is set forth below:

Name of Bank	Account Number	Account Name
Sterling	0500	Platinum Partners Value Arbitrage Intermediate Fund Ltd.
Sterling	0471	Platinum Management (Offshore) LLC
Sterling	0156	Platinum Partners Value Arbitrage Fund L.P.
Sterling	0498	Platinum Partners Value Arbitrage, LP (The GP)
Sterling	0375	PPVA Black Elk (Equity) LLC
Sterling	2784	Platinum Management (NY) LLC
Sterling	0447	Platinum Management (NY) LLC
Fidelity	5957	Daniel I. Small
HSBC	7023	Joseph M. SanFilippo
Signature Bank	7601	David I. Levy
Signature Bank	3098	David Levy - Account 2
Signature Bank	2379	David I. Levy - Baby Account

Very truly yours,

RICHARD P. DONOGHUE
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By: /s/
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)
Defense Counsel (by ECF and E-mail) (w/o enclosures)